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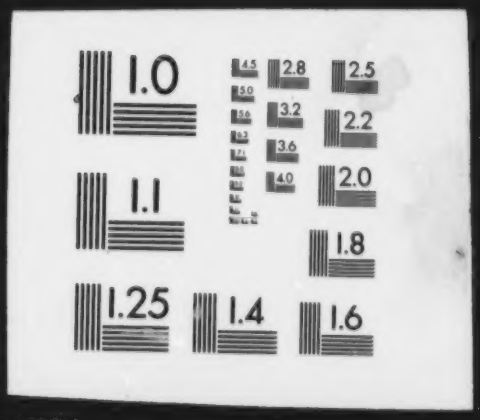

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NPDES Compliance Monitoring Inspector Training: Overview

(U.S.) Environmental Protection Agency
Washington, DC

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U.S. Department of Commerce
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EPA

NPDES Compliance Monitoring Inspector Training

Overview

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16. ABSTRACT

This document is part of a set of five documents which make up the National Pollutant Discharge Elimination System (NPDES) Compliance Monitoring Training Program. The training modules were developed by the Environmental Protection Agency (EPA), Office of Water Enforcement and Permits (OWEP), to instruct NPDES inspectors in various aspects of conducting NPDES Compliance Monitoring Inspections. The five training modules in this set are: 1) Overview, 2) Legal Issues, 3) Biomonitoring, 4) Sampling Procedures, and 5) Laboratory Analysis.

The modules were designed to be used as a self-taught course or as the basis for a lecture course to supplement on-the-job training for NPDES Inspectors. The modules should be presented by experienced and knowledgeable staff who can answer any questions, discuss policies regarding the topic being presented, and conduct on-the-job training. Each module covers a specific aspect of a compliance inspection. Instructors for a particular module may be selected according to their expertise, and training sessions could be scheduled based on the needs, the resources, and the time available to the Region. The modules can be presented individually or as a complete package.

17. KEY WORDS AND DOCUMENT ANALYSIS

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NPDES COMPLIANCE MONITORING

INSPECTOR TRAINING MODULE

OVERVIEW

U.S. ENVIRONMENTAL PROTECTION AGENCY

ENFORCEMENT DIVISION

OFFICE OF WATER ENFORCEMENT AND PERMITS

COMPLIANCE BRANCH

JUNE 1980

DISCLAIMER

This module has been reviewed by the Office of Water Enforcement and Permits, U.S. Environmental Protection Agency, and approved for publication. Mention of trade names or commercial products does not constitute endorsement or recommendation for use.

ACKNOWLEDGEMENT

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INTRODUCTION

The National Pollutant Discharge Elimination System (NPDES) Compliance Monitoring Inspector Training Modules were developed by the Environmental Protection Agency (EPA), Office of Water Enforcement and Permits (OWEP), to instruct NPDES inspectors in various aspects of conducting NPDES Compliance Monitoring Inspections.

The EPA Regions have identified a need for training materials to instruct new employees in conducting NPDES inspections. Training seminars that are currently offered either do not address the training needs of an NPDES inspector or are not available due to limited resources or conflicting course schedules. These training modules were developed to fill the Regions' need for in-house inspector training.

The objectives of the training modules are:

1. To acquaint new inspectors with the NPDES Compliance Inspection program;

2. To serve as a refresher course for experienced NPDES Inspectors;

3. To assure consistency in the NPDES Compliance Inspection program; and

4. To inform and instruct inspectors concerning new inspection procedures.

The modules were designed to be used as a self-taught course or as the basis for a lecture course to supplement on-the-job training. The modules should be presented by experienced and knowledgeable Regional staff who can answer any questions, discuss Regional policies regarding the topic being presented, and conduct on-the-job training.

The module format was chosen for this training program because of its flexibility. Each module covers a specific aspect of a compliance inspection. Instructors for a particular module may be selected according to their expertise, and training sessions could be scheduled based on the needs, the resources, and the time available to the Region. The modules can be presented individually or as a complete package.

An outline of information contained in the individual training modules is listed below. There are currently five NPDES Compliance Monitoring Inspector Training modules:

1. The Overview module gives the inspector an overview of the compliance program and a brief summary of the different types of compliance inspections.

U.S. ENVIRONMENTAL PROTECTION AGENCY

COMPLIANCE MONITORING INSPECTOR TRAINING

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INTRODUCTION (Continued)

2. The Legal Issues module outlines the legal issues which must be addressed during an inspection and legal information that will assist inspectors in performing their duties.

3. The Biomonitoring module outlines the principles of biomonitoring and the role of biological testing in the inspection program.

4. The Sampling module details the sampling procedures that an inspector uses when conducting a sampling inspection.

5. The Laboratory Procedures module outlines the procedures and information necessary for an inspector to perform an effective evaluation of a permittee laboratory.

The layout of the text of each module is on a half page so that students may include their notes with the text.

These training modules were developed for the Regions and are designed to be used by the Regions for in-house training. If these modules are to be a success, the Regions must participate in their ongoing development. This can be accomplished by providing EPA Headquarters with changes or information which Regional instructors or managers believe would improve the modules. The format of the modules can be updated and revised at OWEP as the need arises as they were developed and produced at EPA Headquarters. Cooperation and commitment to training by the Regions will promote the development of a useful training document.

These training modules were developed primarily for Regional NPDES Inspectors; but they are also available to other interested parties such as State offices, attorneys, other program offices, facility owners and operators, and members of the general public.

Comments, information, and suggestions to improve the modules should be addressed to the:

Technical Evaluation and Support Section (EN-338)
Office of Water Enforcement and Permits
U.S. Environmental Protection Agency
401 M Street, SW
Washington, D.C. 20460

Modules covering new topics may be added to the existing ones as the need arises. Subject suggestions for future modules should be sent to the above address.

Requests for training modules will be handled at the above address depending on available supplies.

U.S. ENVIRONMENTAL PROTECTION AGENCY

COMPLIANCE MONITORING INSPECTOR TRAINING MODULE: OVERVIEW

NOTES	LESSON
I. OVERVIEW	I. Overview The purpose of this overview is to examine briefly the types, scope, and nature of the various compliance inspections developed pursuant to the Environmental Protection Agency's (EPA) National Pollutant Discharge Elimination System (NPDES). This overview will also examine the general steps and special considerations an inspector must take in conducting compliance inspections. Future modules will examine individual aspects of compliance inspections in depth. A glossary of terms used in this module is provided in Appendix A.
Appendix A: Glossary	
II. COMPLIANCE ACTIVITIES	II. Compliance Activities There are two major types of compliance activities:
Compliance Review	A. Compliance Review - this is done at the regulatory authorities office and involves a review of the permittee's record and reports. This review screens the permittee for compliance problems which may be followed up with a compliance inspection. Compliance reviews should be performed periodically, according to Regional policy.
Compliance Inspections	B. Compliance Inspections - are conducted at the permittee's facility. The authority for these inspections is covered briefly in the introduction and in-depth in the module on legal aspects. There are four types of compliance inspections:
Compliance Evaluation Inspection	1. The Compliance Evaluation Inspection (CEI), which is nonsampling in nature and encompasses the treatment facility review, self-monitoring review, records and reports review, and

NOTES	LESSON
	compliance schedule status review;
Compliance Sampling Inspection	2. The Compliance Sampling Inspection (CSI), which, in addition to including CEI functions, involves sampling the permittee's effluent to assess compliance with the facility's permit requirements;
Performance Audit Inspection	3. The Performance Audit Inspection (PAI), encompasses the functions of a CEI, yet it is a more detailed review of the permittee's self-monitoring procedures and is nonsampling in nature;
Biomonitoring Inspection	4. The Biomonitoring Inspection (BIO), assesses the toxicity of an effluent in addition to CEI functions. It involves the use of bioassay techniques and record checking to determine compliance with the biomonitoring terms of a permit and/or evaluates the acute toxicity of the effluent.
III. SPECIAL CONSIDERATIONS	III. Special Considerations
Inspector Conduct	A. Inspector Conduct - A NPDES inspector, in conducting inspections for EPA, has certain ethical responsibilities. An inspector is to the permittee the visible aspect of EPA. An inspector is also the backbone of EPA's compliance activities. In this respect, an inspector is expected to report the facts of an investigation completely, accurately, and objectively, and to avoid, at all times, any action or failure to act that might be construed as being motivated by personal or private gain. You may not solicit or accept any gift, gratuity, favor, etc.; and if you are offered a bribe, you should

NOTES	LESSON
	follow the four step procedure shown in Appendix B.
Appendix B: Inspector Ethics Reference: NPDES Compliance Evaluation Inspection Manual	For more information on inspector ethics, refer to the NPDES Compliance Evaluation Inspection Manual published by the Office of Water Enforcement, EPA, Washington D.C., January 1981.
Disclosure of Information	B. Disclosure of Information - On occasion, the NPDES inspector may be asked for general information regarding an inspection. As a rule, you may give general information about EPA programs and activities and describe what you are doing; yet, when specific information regarding an inspection is requested the NPDES inspector must be cautious. It is acceptable to discuss with the permittee deficiencies encountered during an evaluation of the permittee's self-monitoring procedures (and the action required to correct these deficiencies). It is not acceptable to discuss with the permittee information collected during the course of an inspection which may indicate to the inspector that a violation has occurred. This is because evidence of a violation may be used in an enforcement case and the rules for obtaining evidence are very specific. Therefore, when an inspector has reason to believe that there may be cause for an enforcement action, no information should be disclosed without having first consulted with an Enforcement Divison Attorney or an Attorney in the Regional Counsel's Office.
Confidential Information Appendix C: Section 308 of the Act	Furthermore, trade secrets and confidential information are protected from public disclosure by Section 308(b)(2) of the Clean Water Act (1977) (see Appendix C). The type of information which may be considered confidential business information is defined in 40 CFR Part 2.

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	Section 308 (a)(4) states that an inspector may sample an effluent, request information, have the right of entry to the location of the effluent and inspect any monitoring equipment. (For more information on this subject, an inspector should refer to the section on Inspection Legalities in the Legal Module.) The information that is collected is available to the public. If a permittee does not want inspection information to be available to the public, it must request the Administrator of EPA to consider the information confidential. For the information to be confidential, the permittee must show that the information, if made available, would divulge trade secrets. The information may then be classified confidential, yet may still be disclosed to authorized representatives of EPA concerned with carrying out the Act. Therefore, a business is entitled to make a claim of confidentiality for all information which an inspector requests or has access to; but a business may not refuse (on the grounds that the information is considered confidential or a trade secret) to release information requested by the inspector under the authority of Section 308 of the Act. The claim of confidentiality relates only to the public availability of such data and is not for denying access to a facility to EPA inspectors performing duties under Section 308 of the Act.
Handling Confidential Information	It is the inspectors responsibility to handle all material claimed as confidential according to established procedures. For more information on confidentiality and handling confidential information, refer to the legal module.

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Federal and State Cooperation	C. Federal and State Cooperation - You must also be aware of EPA's policy to seek, encourage, and support cooperation between Federal and State governments. Your compliance inspection activities must be coordinated on a continuing basis with State officials, such as, by providing information of your plans and intended activities to performing joint inspections. An inspector must remember that all information gathered during an inspection may be used for an enforcement action and must be treated accordingly. If you have any further questions about handling inspection information, please ask your supervisor.
IV. GENERAL INSPECTION PROCEDURES Responsibilities	IV. General Inspection Procedures A. Responsibilities - The inspector has certain responsibilities in the inspection process. These responsibilities include: 1. Knowledge of permit conditions 2. Knowledge of applicable policies and procedures 3. Short range inspection planning 4. Preinspection planning 5. Conducting the inspection 6. Post inspection reports and follow-up 7. Records maintenance The successful completion of a compliance inspection relies on the inspector having assumed all the responsibilities mentioned above.

NOTES	LESSON
	Since any compliance inspection may lead to an enforcement action, all compliance inspections must be carried out successfully. Again, this is the inspector's responsibility.
Preinspection Procedures	B. Preinspection Procedures - To assure that all inspections are well done, the inspector should plan ahead.
	Planning ahead involves:
Developing Compliance File	1. Development of a compliance file - The development of a compliance file for each permittee is extremely important. A compliance file should contain, at a minimum:
	a. A copy of applicable Federal and State permits including applicable State and water quality regulations
	b. A map showing the facility's location, effluent discharge points, overflow, and bypass discharge points, and all sampling points that are identified in the permit
	c. The names, titles, location, and phone numbers of responsible persons
	d. A flow chart or summary of present or planned treatment and/or abatement facilities
	e. Previous inspection reports
	f. The most recent compliance schedule,

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	if appropriate, and discharge monitoring report g. The letter of notification of inspection pursuant to Section 308 (commonly called 308 letter) h. Other correspondence, such as response to 308 letter i. Reports describing nonroutine analyses j. A plot plan of plant facilities for industrial waste dischargers k. Description of the facility's production processes The compliance file is a valuable aid because it helps to ensure an efficient and complete inspection.
Preparing Equipment Appendix D: Items Useful in an Inspection	2. Ensuring availability and proper operation of equipment - Part of your preinspection activities involve obtaining and preparing equipment. (See Appendix D for a list of useful inspection equipment.) The type of equipment may vary according to the facility inspected and the type of inspection. All equipment must be inspected, calibrated and tested before use. The inspector must also assure that all necessary materials to complete an inspection are taken to the inspection site. It is your responsibility to

NOTES	LESSON
	maintain your equipment properly in accordance with operating instructions.
Obtaining Safety Equipment	3. Knowledge of safety obligations - Safety equipment and procedures required for a facility will be based on the response obtained from the Section 308 (inspection notification) letter and standard safety procedures as described. This safety equipment must be part of the inspectors outfit and safety requirements met, not only for safety reasons, but to assure that the inspector is not denied entry to the facility or parts of it.
Completing Checklist	4. Completion of a checklist - The inspector should complete a checklist before each inspection(s) to assure that all necessary preinspection activities have been completed. This checklist will assure that the EPA inspector will arrive at a facility with all the necessary tools to perform an inspection.
Reviewing Arrangements	5. Making prior arrangements - The inspector should make prior arrangements for a joint inspection with the facility operator if the facility does not have a full-time attendant.
Bound Notebooks	Another important item is a bound, consecutively numbered field notebook. You are responsible for maintaining a legible daily diary which accurately and objectively documents inspection activities. The entries you make are of

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	particular importance because the Governments case in a formal hearing or criminal prosecution often hinges upon the evidence you gather. All entries into a field notebook should be original. Errors should simply be crossed out. Do not erase or tear pages out. A good inspector will note all observations in the notebook. These observations should include: name of plant personnel, notation of pictures taken, time of arrival, person authorizing entrance, along with field data. Information should be recorded immediately. A well-kept field diary not only provides an accurate record of the inspection, it also aids the inspector in filing future inspection reports. All aspects of an inspection must be conducted and recorded in such a manner that they can be accurately reconstructed at a later point in time.
Inspection Procedures	C. Inspection Procedures Regardless of the type of inspection you are conducting, these procedures should be followed: 1. Entering through the main gate 2. Showing your EPA credentials 3. Acting courteously 4. Not signing a waiver of injury or visitor's release 5. Not signing a confidentiality agreement 6. Obtaining consent to enter the facility from the proper plant authority

NOTES	LESSON
	7. Completing the inspection in a timely manner 8. Not offering direct plant operating advice 9. Following all inspectors responsibilities, such as chain of custody procedures, correct handling of confidential information, etc.
V. SPECIFIC INSPECTION PROCEDURES	V. Specific Inspection Procedures We will now discuss the specific inspection procedures for each of the four types of compliance inspections mentioned earlier. Once again, these inspections include the (1) Compliance Evaluation Inspection (CEI), (2) Compliance Sampling Inspection (CSI), (3) Performance Audit Inspection (PAI), and 4) the Compliance Biomonitoring Inspection (BIO).
Compliance Evaluation Inspection Guidance	A. Compliance Evaluation Inspection We will begin with the Compliance Evaluation Inspection. Guidance on performing a CEI is published by EPA Enforcement Division. The NPDES Compliance Evaluation Inspection Manual is a valuable tool and should be read by every inspector. Should the manual not provide you with the necessary information, consult your supervisor. The CEI is the least resource-intensive type of NPDES inspection and does not include the collection of samples. An average of four workdays is allotted to a CEI in terms of resource estimates. The main components of a CEI are:

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Records and Report Review	1. Records and Reports Review- The NPDES permit system requires permittees to maintain records and to report periodically on the amount and the nature of the waste components in their effluents. Section 308 of the Act authorizes inspections of such required records and reports. This is a routine review, the results of which may lead to a more in-depth inspection.
Objectives of a Record and Reports Review	The objectives of a records and reports review are six-fold. First, it documents compliance with permit limitations and requirements. Second, it is used to follow effluent quality trends, as well as specific violations. Third, it helps to define the scope of a suspected violation. Fourth, it determines the adequacy of records maintenance. Fifth, it determines the adequacy of the permittee's reports; and sixth, it documents the quality assurance of the permittee's self-monitoring activities.
Scope of Records and Report Review	In a routine review, the inspector will generally examine the permittee's files to determine if the permittee; 1) keeps and files the required records, 2) maintains records in an up-to-date manner, 3) retains them for the time period required by the NPDES permit or State regulations, and 4) needs assistance on how to comply with the agency's requirements on records and reports.

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Procedures for Conducting Records and Reports Review	An in-depth inspection of a permittee's records and reports will be conducted only when necessary to substantiate a suspected violation, to verify self-monitoring data which may be used as corroborative evidence in an enforcement action, and to confirm apparent sampling, analysis, or reporting discrepancies discovered during the limited inspection. When conducting a records and reports review, the following procedures should be followed a. Discuss recordkeeping and reporting requirements with relevant facility personnel b. Verify the maintenance of sampling and analyses data c. Verify that the facility has a copy of the NPDES permit and that responsible personnel are cognizant of the contents of the permit d. Verify the maintenance of daily operating logs e. Verify the maintenance of management generated records f. Verify the maintenance of pretreatment records g. Verify the maintenance of laboratory records

NOTES	LESSON
	h. Verify that all records and reports are retained for at least three years
Compliance Schedule Status Review	2. Compliance Schedule Status Review - This section has no application if the permit does not contain a compliance schedule. Compliance schedules are set in permits for permittees whose abatement facilities require modification in order to meet the effluent limitations set forth in Section 301 of the act. Compliance schedules contain milestones that the permittee must meet and report on to assure that abatement is attained on schedule. Reports of progress and current status are used by the Regulatory Authority to determine compliance with set milestones. On those inspections conducted after final effluent limitations have been achieved, this phase of the inspection is not appropriate.
Objectives of Compliance Schedule Status Review	The objectives of a compliance schedule status review are fourfold. First, it determines the accuracy of reports relating to compliance schedules. Second, it determines the permittee's conformance to the compliance schedule and, if not, what the delays are caused by and whether final treatment requirements will be achieved on time. Third, it documents cases of schedule violation and delays; and fourth, it serves as a means to determine the validity of requests for permit modifications.

NOTES	LESSON
Inspector's Responsibilities in Conducting Compliance Schedule Status Review	You have certain obligations and responsibilities as a NPDES inspector in regard to compliance schedule status reviews. For example, you must be familiar with the permittee's compliance schedule requirements and his progress reports. Compliance schedules should be reviewed and status reviews coordinated with Regional or State construction grants personnel, if appropriate. Also, you should review the permittee's plans, specifications, construction and equipment contracts, and work orders to assure that construction is going as scheduled. Furthermore, you are responsible for conducting a visual inspection of the permittee's construction and equipment.
Procedures for Compliance Schedule Status Review	When conducting a compliance schedule status review, you must: a. Check the progress of construction activities (visually) b. If delays are apparent, check that the permittee has the authority to construct the necessary installation and has financing available c. Review the permittee's contract and equipment orders if delays are apparent d. Determine causes for existing or projected delays

NOTES	LESSON
	e. Determine whether appropriate procedures are being used to ensure attainment of operational status after contruction is completed, such as training of operating personnel f. Check that the state of construction matches that reported to the regulatory authority in progress reports g. If delays are apparent, check that the permittee has notified the permit issuing authority promptly of delays and the measures he has taken to minimize the delay
Facility Site Review	3. Facility Site Review An inspector, in performing a facility site review, is examining areas on the permittee's premises where pollutants are generated, pumped, conveyed, treated, stored, or disposed. The inspector also does a visual inspection of monitoring equipment. You must have a full understanding of each treatment process in the facility and how each process fits into the overall treatment scheme, as well as upstream conditions that affect treatment operations, in order to examine the facility effectively.
Objectives of Facility Site Review	The objective of a facility review is to examine the permittee's premises for problem areas. This overall review of

NOTES	LESSON
Procedures for Conducting Facility Site Review	the facility allows the inspector to gain a feeling for the facility he/she is inspecting and to review areas that may indicate problems with effluent limitations. When conducting an industrial facility site review, you must be or become knowledgeable and familiar with the following: a. Industrial flow diagrams of the raw water used for production b. Raw materials c. Additives d. End Products e. By-products f. Other liquid, gaseous, and solid wastes g. Treatment processes h. Flow diagrams i. Chemical treatments j. Wastewater characteristics k. Facility's water consumption and distribution usage l. Hydraulics of the drainage and collection systems m. Production processes n. Dump schedules o. Required treatment methods

NOTES	LESSON
Procedures for Conducting Facility Site Review	Before conducting the tour, you must hold preinspection discussions with the facility owner and/or operator. During these discussions, explain your authority to enter the facility and discuss the applicable provisions of the Clean Water Act. It is to the inspector's advantage to do the facility review as soon as possible after entering the facility. This prevents the permittee from altering any problem areas. After these discussions you will be ready to conduct the tour of the facility. During the plant tour the inspector should be alert and inquire about situations such as: a. Accumulations of solids and scum in wet wells, excessive scum buildup, grease, foam or floating materials in tanks; b. Surcharging of influent lines, overflow weirs, and other structures; c. Collected screenings, slurries, sludges, or other by-products of treatment; (Their disposal, including the runoff of waste-waters, must be in such a manner as to prevent entry into navigable waters or their tributaries.) d. Obnoxious odors in wet wells, grit chambers, around aerobic biological units, scum removal devices, and sludge handling facilities;

NOTES	LESSON
	e. Vital treatment units out of service for repairs; (Determine when they were taken out of service, the type of failure, and when the units will be put back in service.) f. Excessive weed and algae in stabilization ponds, etc.; (Check earthen retention walls (dikes) for breaches, leaks, and other problems requiring maintenance.) g. Freezing wastewater in ammonia stripping towers and formation of excessive calcium carbonate deposits on tower structures, fouling of fabric in microscreens with grease and solids, and mechanical fouling of activated carbon columns; h. Unauthorized discharge points and/or bypasses, channels, or other areas likely to have overflows; (Inspect to see if spills or authorized usage has recently occurred as a result of operating personnel attempting to correct operational problems.) i. Sludge decomposing in clarifiers as indicated by gas bubbles rising to the surface or by floating sludge pads; j. Any unusual equipment such as special pumps, floating aerators in diffused air systems, chemical feeders, temporary construction or

NOTES	LESSON
	structures, or any rigged structures, or any rigged systems intended to correct operational problems; and k. Excessive suspended solids, turbidity, foam, grease, scum, color, and other macroscopic particulate matter in the plant effluent and the receiving waters. l. Adequate safeguards to prevent the discharge of untreated or inadequately treated wastes during electrical failures; m. Visual condition of discharges (i.e. scum, foam, solids, color, steam, oil, etc.); and n. Changes in production. (If production changes have been introduced, conduct an industrial process verification, inquire about the changes, determine if the changes will increase the facility discharge above the effuent limitation, and inquire whether EPA was notified of the changes. In addition, you should check the facility's maintenance program and conduct post-inspection discussions. This will be covered later in the presentation.)
Self-Monitoring Review	4. Self-Monitoring Review The self-monitoring review is the component of the CEI that

NOTES	LESSON
	examines the permittee's self-monitoring program. To do this review thoroughly, it is the inspector's responsibility to be familiar with the monitoring requirements contained in the permittee's permit and any correspondence which may have modified or reestablished sampling points or analytical procedures. The inspector should be thoroughly familiar with approved test methods and specified sample holding times, or in the case of complex list, have available a reference list of the approved methods for those samples required by the permit.
Objectives of Self-Monitoring Review	The objectives of the self-monitoring review are first to confirm that sampling and flow measurement equipment are provided as required in the permit and that they are being operated and maintained properly; secondly, to verify that the analyses are being performed with the proper equipment and by persons who have the requisite skills; and to confirm that the analytical test methods used for pollutants or parameters specified in NPDES permits conform with the Agency's regulations as specified in the Federal Register (40 CFR 136).
Procedures for Conducting Self-Monitoring Review	When conducting the review, the inspector should: a. Verify that flow measurement devices are in use

NOTES	LESSON
	b. Verify that samples are taken at locations prescribed in the NPDES permit c. Verify that the sampling location specified in the permit is adequate to provide a representative sample of the discharge d. Verify that the frequency of sampling is done in accordance with the NPDES permit e. Verify that sampling equipment is in working order and maintained correctly f. Verify that samples are preserved in accordance with EPA recommended procedures g. Verify that samples are analyzed within holding times specified in 40 CFR and analyzed according to approved test methods h. Verify that chain of custody procedures are used i. Verify that quality assurance is used in all self-monitoring programs j. Examine laboratory if on-site to verify that approved test methods are used k. Examine to see that equipment is maintained,

NOTES	LESSON
	operated, and calibrated correctly
DMR Quality Assurance Inspection	A DMR Quality Assurance inspection is a type of CEI which includes the same objectives and requires the same resources as a typical CEI. The DMR/QA inspection focuses on aspects of quality assurance in the permittee's self-monitoring program, usually as a follow-up on DMR/QA performance sample findings, along with all other aspects of a CEI. For more details on examining the permittee's self-monitoring program, please refer to the section on Performance Audit Inspections and the CEI Manual.
Completing CEI Inspection	The inspector should complete the Compliance Inspection Report form (EPA 3560-3) for all sections applicable to the CEI (see Appendix E for a copy of the Compliance Inspection Report form). The inspection type for a CEI is "C" (Column 18 of the Compliance Inspection Report form). For more information, see the section on Reports.
Appendix E: Compliance Inspection Report Form	
Compliance Sampling Inspection	B. Compliance Sampling Inspection The next type of compliance inspection is the Compliance Sampling Inspection (CSI). Inspectors should be familiar with the NPDES Compliance Sampling Inspection Manual. The average resource allocation for a CSI ranges from 16 days for a municipal facility to 30 days for an industrial facility.
Reference: NPDES Compliance Sampling Inspection Manual	
Objectives of a Compliance Sampling Inspection	The objectives of the CSI are fivefold. First, it serves to verify the permittee's compliance with the effluent limitations specified in the

NOTES	LESSON
	permit. Second, it is used to verify self-monitoring data. Third, it is used to ensure that parameters specified in the permit are consistent with the facility's wastewater characteristics. Fourth, it supports permit reissuance and revision and builds a file for further inspections; and fifth, it supports enforcement actions. There are two types of CSIs, a conventional CSI conducted at either a nonmunicipal or industrial facility and a CSI for toxics, which involves more resources to accommodate sampling and analysis of toxic pollutants.
Procedures for Conducting Compliance Sampling Inspection	In addition to the information to be collected as part of the CEI, there are ten other steps or procedures in the CSI. They are: 1. Sample at the locations and for the parameters specified in the NPDES permit; 2. Sample at locations and for parameters not specified in the NPDES permit as requested by enforcement personnel; 3. Verify operation and calibration of monitoring equipment; 4. Measure flow by either verifying accuracy of in-plant equipment or by actual independent flow measurement; 5. Verify that the permittee's sampling location(s) includes all the effluent from process and nonprocess wastewater system(s); 6. Verify that the sampling location specified in the permit is adequate for the collection of a representative sample of the wastewater;

NOTES	LESSON
	7. Verify that the permittee's sampling technique is adequate to ensure the collection of a representative sample; 8. Verify that the permit sampling and monitoring requirements will yield representative samples; 9. Verify that the parameters specified in the permit are adequate to cover all pollutants of concern that may be discharged by the permittee; and 10. Conduct post-inspection discussions limited to specific findings with appropriate representatives of the permittee. More detailed information about sampling and flow measurement is provided in the sampling training module and the flow-measurement module.
Completing Compliance Inspection Report Form	It is important to note that a CSI inspection incorporates all aspects of a CEI plus sampling. The NPDES Compliance Inspection Report is used for all inspection types. Please refer to the NPDES Inspection Report form (EPA 3560-3). The inspection type for CSI is "S" (Column 18 of the CSI Report form). In the Compliance Sampling Inspection, Section B will be completed in addition to those sections required for a CEI. This section describes the facility's effluent characteristics and should be filled out after sampling and comparing your findings to the permit's requirements. Section C, Effluent Within Permit Requirements, should also be completed. Sections M and N are also completed during a CSI.

NOTES	LESSON
Performance Audit Inspection	C. Performance Audit Inspection The next type of compliance inspection is the Performance Audit Inspection (PAI). The PAI examines self-monitoring procedures along with all aspects of a CEI. This type of inspection is authorized under Section 308 (a)(b)(II) of the Clean Water Act. It requires approximately 12 workdays for completion. All inspectors should be familiar with the Performance Audit Inspection Policy and Guidance published by EPA. There are six major objectives of the PAI.
Reference: Performance Audit Inspection Policy and Guidance	1. Evaluates compliance schedules and Discharge Monitoring Report data 2. Determines if permit self-monitoring requirements are being met and are adequate 3. Evaluates sampling techniques 4. Evaluates analytical procedures 5. Evaluates quality assurance procedures 6. Supports enforcement action(s)
Inspectors Obligation in Conducting Performance Audit Inspection	The NPDES inspector has several responsibilities and obligations for the PAI. First, you must be familiar with the self-monitoring requirements in the permit. Second, you must be familiar with any correspondence modifying sampling points. Third, you must fulfill the objectives of a CEI. Fourth, you must visually inspect all aspects of self-monitoring procedures; and fifth, you must be knowledgeable of common self-monitoring deficiencies.

NOTES	LESSON
Deficiencies and Violations	The inspector should review the module on sampling procedures and laboratory analysis for information on deficiencies in these areas. The inspector should be able to distinguish between a deficiency in self-monitoring procedures (which may be corrected by instruction on the proper procedures) and violations, which should be recorded on the Compliance Inspection Report form and should not be discussed with the permittee.
Procedures for Conducting a Performance Audit Inspection	When conducting a PAI, you are expected to do the following: 1. Confirm that weirs and other flow measurement devices are appropriate for the waste stream being measured; (You must verify that the devices are properly installed, free from debris, and properly maintained (see flow measurement module)) 2. Observe instrument calibration and maintenance; 3. Check for the existence of a flow recording device, its operation, and the flow records; (if the permit requires "continuous flow" monitoring) 4. Observe sample collection and measurement techniques, including preservation, holding time, location of sampling point equipment, etc. (see page 9 of PAI Manual) for deficiencies; and 5. Examine record and reports.

NOTES	LESSON
	If the facility has an on-site laboratory, you must: 1. Verify (by referring to 40 CFR 136 and Section 304(h)) that a given method of analysis is approved for the parameter being analyzed; 2. Verify that the laboratory has written instructions on analytical test methods and examine staff capabilities; 3. Verify that quality control methods are being employed; 4. Check equipment available and it's condition; 5. Check for proper sign-off procedures; 6. Check health and safety conditions; 7. Check the laboratory maintenance and calibration records; 8. Check reagents and standard solution viability; 9. Check proper shipment of samples if not analyzed on-site; and 10. Evaluate laboratory capabilities with performance samples. If the permittee uses an off-site laboratory, you must: 1. Verify the name and address of the laboratory; 2. Verify the procedures for labeling and shipping samples;

NOTES	LESSON
	3. Verify that results are properly coded; 4. Check for on-site evaluations by other EPA programs; 5. Verify holding time and method of preservation; and 6. Verify compliance with DOT regulations for shipment of hazardous materials. If possible, an off-site laboratory should be evaluated in the same manner as an on-site laboratory, if it has not previously been evaluated.
Deficiencies	In conducting a PAI, a thorough knowledge of correct and required sampling and analysis procedures is essential to determine deficiencies. As the inspection proceeds, inspectors should discuss observed deficiencies with the permittee self-monitoring personnel and identify correct procedures wherever feasible. Detailed notes of deficiencies, identified corrections and responses should be kept by the inspectors. Evidence of a violation may be used in an enforcement case and should be treated accordingly. If a violation is suspected, the inspector should neither discuss nor try to obtain information concerning the apparent violation from the permittee. The inspector should note all information pertaining to an apparent violation on the NPDES Compliance Inspection Report form (EPA 3560-3) and not through a notice at the time of inspection (i.e. Deficiency Notice).
Debriefing Session	At the end of the PAI, the inspection team should provide a debriefing for facility officials. During the debriefing session the

NOTES	LESSON
Appendix F: Deficiency Notice Form	team reviews deficiencies found during the PAI inspection of self-monitoring procedures and advises the permittee on correct procedures. The debriefing should be limited to the discussion of objective findings relevant to the self-monitoring program. A Deficiency Notice, developed by the Office of Water Enforcement for use nationally (see Appendix F), may be issued by the inspection team as part of the debriefing session if a deficiency is found. They are to be used primarily to alert the permittee to either existing or potential problems with self-monitoring. Deficiency Notices apply strictly to the deficiencies noted in the various aspects of permittee self-monitoring activities, not to possible serious violations of the law. Any other apparent permit violation should be reported on the NPDES Compliance Inspection Report form (EPA 3560-3).
Completing the Compliance Inspection Report Form	When completing the NPDES Compliance Inspection Report form (EPA 3560-3) for entering data into the automated Permit Compliance System (PCS), the symbol for PAI is "A", to be inserted in the space marked "type" (upper right, page 1, column 18).
Biomonitoring Inspection	D. Biomonitoring Inspection The CBI involves the collection of the permittee's effluent, conducting acute bioassays, determining the instream waste concentration of the effluent, and reviewing the permittee's biomonitoring program. A PAI or CEI may also be used to evaluate the permittee's biomonitoring program. The resources for biomonitoring are 6 days for a 24 hour static bioassay and 30 days for a 96 hour flow-through.
Reference: Interim NPDES Compliance Biomonitoring Inspection Manual	The Interim NPDES Compliance Biomonitoring Inspection Manual (1979) is the principal reference for this inspection. The biomonitoring

NOTES	LESSON
	sampling inspections are being covered in much greater detail in the module on biomonitoring. The purpose for the inspection may be to evaluate the permit limitations, to develop an enforcement case, to investigate probable cause violations or to evaluate Best Practicable Technology/ Best Available Technology (BPT/BAT) for a permittee. The objective of the CBI is to measure the toxicity of the effluent.
Inspectors Obligation in Conducting Biomonitoring Inspection	As with the other inspection types, the NPDES inspector has certain obligations and responsibilities. These include: 1. Knowledge of biomonitoring permit conditions, effluent toxicity limitations, and related interim and final requirements set forth in the latest NPDES permit; 2. Knowledge of EPA policies and procedures for conducting, interpreting, and reporting biomonitoring of wastewater effluent; 3. Completing the inspection plan and scheduling the inspection; 4. Conducting the on-site biomonitoring evaluation; 5. Preparing or assembling complete and accurate records of self-monitoring practices and other issues addressed during a biomonitoring inspection; and 6. Follow-up with appropriate representatives of the permittee after the

NOTES	LESSON
	inspection with regard to biomonitoring performance, quality control, and related compliance activities evaluated during the inspection.
Types of Biomonitoring Inspections	On-site biomonitoring inspections include: 1. An 8- to 24-hour range finding static bioassay; 2. A 96-hour flow-through bioassay; 3. A 24-hour quality assurance bioassay with reconstituted water and a standard toxicant; and 4. Careful examination of the permittee's self-monitoring program. Off-site analysis for biomonitoring inspections consists of a static 24-hour bioassay. A sample of the permittee's effluent is collected and taken to an EPA laboratory for testing. An LC50 is calculated from the bioassay. The product of the LC50 and an application factor are compared with the instream waste concentration to determine compliance.
Completing Compliance Inspection Report Form	As with other inspection types, the Compliance Inspection Report form (EPA 3560-3) is used for both sampling and nonsampling biomonitoring inspection reporting. Instructions for coding the inspection results will be described in the biomonitoring module.
Acute Toxicity Laboratory Evaluation Form	The Acute Toxicity Laboratory Evaluation form is used in conjunction with the Compliance Inspection Report form for biomonitoring inspections.

NOTES	LESSON
	This form and its uses will be covered in greater detail in the module on biomonitoring.
VI. REPORTING REQUIREMENTS	VI. Reporting Requirements The results of all inspections are reported on the NPDES Compliance Inspection Report form (EPA 3560-3). Instructions for filling out this form are described on the back of page 1 of the form. In each inspection overview, the coding symbol for the type of inspection has been given. To summarize, a CEI is a "C," a conventional CSI an "S," a toxic CSI an "X," a PAI an "A", a Biomonitoring Inspection a "B." The inspector should fill out the inspection report form as completely as possible and as soon as possible after the inspection to assure that the report is filled out accurately and to the extent required. The inspector should note that compliance activities are based on results reported on the inspection report form and must, therefore, take care in completing the form truthfully and accurately. Deficiencies found while doing a PAI are noted on a Deficiency Notice. Information on the use of this form is in Appendix F.
Appendix F: Deficiency Notice	
VII. POST-INSPECTION PROCEDURES	VII. Post-Inspection Procedures Thus far in this training module, the types of inspections, the NPDES inspector's obligations and responsibilities, preinspection activities, procedures for each type of inspection, and the types and uses of the NPDES Compliance Inspection Report form (EPA 3560-3) have been covered. The last subject area to cover is post-inspection or follow-up activities. There are seven major post-inspection activities. These are as follows:
Post-Inspection Activities	

NOTES	LESSON
Discussion	A. Post-inspection discussion with the permittee. After concluding the inspection, you should communicate the results of the inspection to the permittee. However, your discussion must be limited to specific findings of the visit. Also, remember that the overall compliance or noncompliance status of the permittee is determined by the Enforcement Division after reviewing EPA form 3560-3. Therefore, your discussions should be limited to routine self-monitoring deficiencies and not to violations of the permit.
Analytical Data	B. Analytical data. For off-site testing, laboratory analysis should be completed as quickly and efficiently as possible. Results of the lab analysis will, in turn, be used to complete compliance reports.
Completing Reports	C. Completion of reports and forms. Immediately after returning to the office, you are expected to complete EPA form 3560-3 to the extent possible before laboratory analysis results are returned.
Distribution of Reports	D. Distribution of report to the Enforcement Division. Upon completion of the reports, you must distribute them to the appropriate enforcement personnel (see your supervisor for direction). In turn, the enforcement personnel will determine status of compliance.
Testimony	E. Testimony. In certain cases, the Enforcement Division may decide to take the permittee to court. Should this occur, you may be asked to testify. It is important that your diary and field notes be objective and legible for this purpose.
Updating Compliance File	F. Updating the permittee's compliance file. This should be done as soon as possible after the inspection.

NOTES	LESSON
Entering Data into PCS	G. When all data has been placed on the inspection form, it is the inspector's duty to make sure that the data is entered into the PCS. An inspection is not credited until coded into PCS. Timely completion of reports is therefore important.
VIII. SUMMARY	VIII. Summary In summary, this module has covered the basic purpose for compliance inspections, the general methods for conducting an inspection and a brief overview of the different types of compliance inspections. At this point, you as inspectors should have an idea of the scope of the NPDES Compliance program. Remember that inspectors represent EPA's interests in the field and are, therefore, responsible to act in an effective, efficient and responsible manner. If you have any questions regarding the material, please see your supervisor or consult the reference materials noted in this manual.

APPENDIX A - GLOSSARY

GLOSSARY

Acclimation - The physiological and behavioral adjustments of an organism to changes in its immediate environment.

Act - The Federal Water Pollution Control Act, often referred to as the Clean Water Act.

Acute Toxicity - Short-term effect of a toxicant on test organisms. Death is usually the end point in acute toxicity tests expressed as LC50 or EC50.

Administrator - The Administrator of the U.S. Environmental Protection Agency.

Agency - The U.S. Environmental Protection Agency (EPA).

Announced Inspection - The type of inspection in which the permittee is made aware of the exact dates in which the inspection is to take place.

Audit or Performance Audit Inspection (PAI) - A nonsampling inspection which includes observation of all the elements of a permittee's self-monitoring program, such as testing procedures and methodology, quality assurance, data gathering and interpretation, files, and laboratory facilities.

Bioassay - A biological test used to measure the toxicity or effect of wastewater to aquatic organisms.

Biomonitoring - All testing methods that utilize any biological system or any of its parts for assessing the toxicity or effects of a permittee's wastewater. For this module's purposes, biomonitoring refers strictly to acute bioassays.

Chain-of-Custody - All the administrative procedures directed toward protecting and certifying the integrity and, therefore, the acceptability of evidence in a legal proceeding.

Compliance Evaluation Inspection (CEI) - An inspection conducted without sampling to determine compliance with the Clean Water Act and NPDES permit requirements.

Compliance Monitoring - Collection and evaluation of data including self-monitoring reports and verification to show whether pollutant concentrations and loads contained in permitted discharges are in compliance with the limits and conditions specified in the permit.

Compliance Sampling Inspection (CSI) - An inspection conducted with sampling to determine compliance with the Clean Water Act and NPDES permit requirements.

Compliance Schedule - A schedule of remedial measures, including an enforceable sequence of actions or operations, leading to compliance with an effluent limitation, prohibition, or standard.

Composite Sample - The type of sample made out of several discrete samples collected at equal time intervals. Composite samples can also be collected proportional to the flow rate over the compositing period (see pages 28 to 32 of EPA's NPDES Compliance Sampling Manual).

Confidential Information - Information supplied to EPA by a permittee, which, if made public, would divulge methods or processes entitled to protection as trade secrets.

Definitive Test - Full scale bioassay consisting of at least five different concentrations of effluent in an exponential series with each concentration and control being tested against a sufficient number of organisms of a given species to produce statistical significance.

Discharge Monitoring Report (DMR) - Information that permittees must submit at least quarterly on their self-monitoring program to the respective NPDES permitting authority. At present, EPA Form 3320-1 (Rev. 10-77) is used for reporting purposes.

Document Control - Administrative procedures used for the purpose of tracking and maintaining adequate records of all documents issued by, or generated by, a particular program.

Effluent - For the purposes of this module, an outflow from a point source with some of its physical, chemical, and biological parameters being regulated by an NPDES permit.

Flow-through Bioassay - Continuous flow bioassay. The type of test in which different concentrations of the effluent are prepared by mixing it with adequate quality dilution water and are then tested by allowing such effluent concentrations to flow at predetermined rates into chambers containing the test organism.

Grab Sample - Individual single dip sample collected over a period of time not exceeding 15 minutes.

Inspector - Any officer, employee, or contractor of the EPA or of any State duly authorized by the Administrator to conduct inspections, make investigations, collect samples, or otherwise carry out the provisions of the Act.

In-stream Waste Concentration (IWC) - The concentration (expressed as percent) of permittee's waste in the receiving stream at the 7010 mean low flow. This is a 7-day flow - the lowest expected in a 7-day period to occur, on the average, once every 10 years.

LC50 - Median lethal concentration producing death in 50 percent of the test organisms.

Monitoring - In this module, overview by actual sampling and/or evaluation of NPDES permittees' compliance with permit conditions.

Multimedia Inspection - The conduct of an inspection to determine the compliance status of two or more types of pollution.

NPDES or National Pollutant Discharge Elimination System - Refers to permit system developed by EPA under the authority granted by Section 402 of the Clean Water Act.

Plot Plan - Is a map of a facility describing the layouts of buildings, production processes, and other facility structures.

Point Source - Any discernible, confined, and discrete conveyance, including, but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation or vessel, or other floating craft from which pollutants are or may be discharged as defined in the Act.

Process Verification - Verification that process raw materials, water usage, waste treatment processes, production rate, and other factors relative to quantity and quality of pollutants contained in discharges are substantially described in the permit application and the issued permit.

Quality Assurance (QA) - For the purposes of this Manual, all scientific tests and administrative procedures used to ensure the scientific and legal validity of results obtained from monitoring tests.

Quality Assurance Bioassay - Is a bioassay done with a standard toxicant to determine the sensitivity of test organisms.

Rangefinding Test - A short-term (8-24 hours) flow-through or static bioassay (usually static) used for determining the approximate concentrations, above and below the LC50, to be used in the definitive test. In this test, groups of five organisms are exposed to from three to five widely spaced effluent dilutions.

Records and Reports - All records and reports maintained pursuant to Section 308(a)(A) of the Act and as specified in the permittee's NPDES permit.

Sampling Point - Particular site, the location of which may be specified in a permit and from which effluent samples are to be collected for testing and evaluation.

Standard Toxicant - Toxic reference material used for QA purposes in the biomonitoring program. Its main functions are to determine the reproducibility of test results and differences in sensitivity among batches of test organisms.

Treatment Works - Any facility, method, or system for the storage, treatment, recycling, or reclamation of municipal sewage or industrial waste of a liquid nature, including water in combined storm water and sanitary sewer systems.

APPENDIX B - ETHICS

ETHICS

- Develop and report facts of an investigation completely, accurately, and objectively.
- Avoid any action (or failure to act) that could be considered to be motivated by personal or private gain.
- Recognize and avoid any conflict of interests.
- Dress and act properly.
- Do not accept gifts, gratuities, favors, etc.
- If offered something of value, follow these procedures:
  - Ask what the offer is for
  - Explain, if the offer is repeated, that both parties to such transactions may be guilty of violating Federal statutes
  - Do not accept money or goods
  - Report the incident in detail to your supervisor.

References:

Environmental Protection Agency. NPDES Compliance Evaluation Inspection Manual. Washington, D.C.: EPA, 1976, pp. 1-4.

Environmental Protection Agency. "Responsibilities and Conduct for EPA Employees." Federal Register, vol. 38, no. 73.

APPENDIX C - SECTION 308

such publicly owned treatment works may be revised by the owner or operator of such works to reflect the removal of such toxic pollutant by such works."

(3) The Administrator shall, from time to time, as control technology, processes, operating methods, or other alternative change, revise such standards following the procedure established by this subsection for promulgation of such standards.

(3) When proposing or promulgating any pretreatment standard under this section, the Administrator shall designate the category or categories of sources to which such standard shall apply.

(4) Nothing in this subsection shall affect any pretreatment requirement established by any State or local law not in conflict with any pretreatment standard established under this subsection.

(c) In order to insure that any source introducing pollutants into a publicly owned treatment works, which source would be a new source subject to section 306 if it were to discharge pollutants, will not cause a violation of the effluent limitations established for any such treatment works, the Administrator shall promulgate pretreatment standards for the category of such sources simultaneously with the promulgation of standards of performance under section 306 for the equivalent category of new sources. Such pretreatment standards shall prevent the discharge of any pollutant into such treatment works, which pollutant may interfere with, pass through, or otherwise be incompatible with such works.

(d) After the effective date of any effluent standard or prohibition or pretreatment standard promulgated under this section, it shall be unlawful for any owner or operator of any source to operate any source in violation of any such effluent standard or prohibition or pretreatment standard.

INSPECTIONS, MONITORING AND ENTRY

Sec. 308. (a) Whenever required to carry out the objective of this Act, including but not limited to (1) developing or assisting in the development of any effluent limitation, or other limitation, prohibition, or effluent standard, pretreatment standard, or standard of performance under this Act; (2) determining whether any person is in violation of any such effluent limitation, or other limitation, prohibition or effluent standard, pretreatment standard, or standard of performance; (3) any requirement established under this section; or (4) carrying out sections 305, 311, 402, 404 (relating to State permit programs), and 504 of this Act—

(A) the Administrator shall require the owner or operator of any point source to (i) establish and maintain such records, (ii) make such reports, (iii) install, use, and maintain such monitoring equipment or methods (including where appropriate, biological monitoring methods), (iv) sample such effluents (in accordance with such methods, at such locations, at such intervals, and in such manner as the Administrator shall prescribe), and (v) provide such other information as he may reasonably require; and

(B) the Administrator or his authorized representative, upon presentation of his credentials—

(i) shall have a right of entry to, upon, or through any premises in which an effluent source is located or in which any records required to be maintained under clause (A) of this subsection are located, and

(ii) may at reasonable times have access to and copy any records, inspect any monitoring equipment or method required under clause (A), and sample any effluents which the owner or operator of such source is required to sample under such clause.

(b) Any records, reports, or information obtained under this section (1) shall, in the case of effluent data, be related to any applicable effluent limitations, toxic, pretreatment, or new source performance standards, and (2) shall be available to the public, except that upon a showing satisfactory to the Administrator by any person that records, reports, or information, or particular part thereof (other than effluent data), to which the Administrator has access under this section, if made public would divulge methods or processes entitled to protection as trade secrets of such person, the Administrator shall consider such record, report, or information, or particular portion thereof confidential in accordance with the purposes of section 1905 of title 18 of the United States Code, except that such record, report, or information may be disclosed to other officers, employees, or authorized representatives of the United States concerned with carrying out this Act or when relevant in any proceeding under this Act.

(c) Each State may develop and submit to the Administrator procedures under State law for inspection, monitoring, and entry with respect to point sources located in such State. If the Administrator finds that the procedures and the law of any State relating to inspection, monitoring, and entry are applicable to at least the same extent as those required by this section, such State is authorized to apply and enforce its procedures for inspection, monitoring, and entry with respect to point sources located in such State (except with respect to point sources owned or operated by the United States).

FEDERAL ENFORCEMENT

Sec. 309. (a) (1) Whenever, on the basis of any information available to him, the Administrator finds that any person is in violation of any condition or limitation which implements section 301, 302, 306, 307, 308, 318, or 405 of this Act in a permit issued by a State under an approved permit program under section 402 or 404 of this Act, he shall proceed under his authority in paragraph (3) of this subsection or he shall notify the person in alleged violation and such State of such finding. If beyond the thirtieth day after the Administrator's notification the State has not commenced appropriate enforcement action, the Administrator shall issue an order requiring such person to comply with such condition or limitation or shall bring a civil action in accordance with subsection (b) of this section.

(2) Whenever, on the the basis of information avail-

APPENDIX D - EQUIPMENT

EQUIPMENT

(1) Personal Protective Equipment

- Hardhat
- Nonskid, metal-toed shoes or boots with rubber soles
- Safety glasses
- Gloves
- Ear protector
- Breathing mask or respirator
- First-aid kit
- Fire extinguisher
- Soap, waterless hand cleaner, and towels
- Long-sleeved shirt and pants (no ties)

(2) Miscellaneous Equipment

- Camera
- Pocket calculator
- Thermometer
- Sample bottles
- Clip board
- Level
- Psychrometer
- Rangefinder
- Tape measure
- Compass
- Stopwatch
- Windmeter
- Square
- Ruler
- Spare parts for samplers
- Custody records
- Handbook of flow tables

REMEMBER: The situation or type of inspection will dictate safety needs. Also, refer to the safety equipment list received in response to the Section 308 (inspection notification) letter.

APPENDIX E - NPDES COMPLIANCE INSPECTION

REPORT FORM

Form Approved
OMB No. 158 - R0073

NPDES COMPLIANCE INSPECTION REPORT *(Coding Instructions on back of last page)*

TRANSACTION CODE		NPDES	YR	MO	DA	TYPE	INSPEC-TOR	FAC TYPE	TIME
1	2	3 — 11	12		17	18	19	20	a.m. / p.m.
	5								

REMARKS (21 — 64)

ADDITIONAL (65 — 70)

SECTION A - Permit Summary

NAME AND ADDRESS OF FACILITY *(Include County, State and ZIP code)*	EXPIRATION DATE
	ISSUANCE DATE

RESPONSIBLE OFFICIAL	TITLE	PHONE
FACILITY REPRESENTATIVE	TITLE	PHONE

SECTION B - Effluent Characteristics *(Additional sheets attached _____)*

PARAMETER/ OUTFALL		MINIMUM	AVERAGE	MAXIMUM	ADDITIONAL
	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT				
	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT				
	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT				
	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT				
	SAMPLE MEASUREMENT				
	PERMIT REQUIREMENT				

SECTION C - Facility Evaluation *(S = Satisfactory, U = Unsatisfactory, N/A = Not applicable)*

	EFFLUENT WITHIN PERMIT REQUIREMENTS		OPERATION AND MAINTENANCE		SAMPLING PROCEDURES
	RECORDS AND REPORTS		COMPLIANCE SCHEDULE		LABORATORY PRACTICES
	PERMIT VERIFICATION		FLOW MEASUREMENTS		OTHER:

SECTION D - Comments

SECTION E - Inspection/Review

SIGNATURES	AGENCY	DATE
INSPECTED BY		
INSPECTED BY		
REVIEWED BY		

ENFORCEMENT DIVISION USE ONLY

COMPLIANCE STATUS

☐ COMPLIANCE

☐ NONCOMPLIANCE

Form Approved
OMB No. 158 - R0073

Sections F thru L: Complete on all inspections, as appropriate. N/A = Not Applicable	PERMIT NO.

SECTION F - Facility and Permit Background

ADDRESS OF PERMITTEE IF DIFFERENT FROM FACILITY *(Including City, County and ZIP code)*	DATE OF LAST PREVIOUS INVESTIGATION BY EPA/STATE
	FINDINGS

SECTION G - Records and Reports

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. ☐ YES ☐ NO ☐ N/A *(Further explanation attached ____)*
DETAILS:

(a) ADEQUATE RECORDS MAINTAINED OF:			
(i) SAMPLING DATE, TIME, EXACT LOCATION	☐ YES	☐ NO	☐ N/A
(ii) ANALYSES DATES, TIMES	☐ YES	☐ NO	☐ N/A
(iii) INDIVIDUAL PERFORMING ANALYSIS	☐ YES	☐ NO	☐ N/A
(iv) ANALYTICAL METHODS/TECHNIQUES USED	☐ YES	☐ NO	☐ N/A
(v) ANALYTICAL RESULTS *(e.g., consistent with self-monitoring report data)*	☐ YES	☐ NO	☐ N/A
(b) MONITORING RECORDS *(e.g.,flow, pH, D.O., etc.)* MAINTAINED FOR A MINIMUM OF THREE YEARS INCLUDING ALL ORIGINAL STRIP CHART RECORDINGS *(e.g. continuous monitoring instrumentation, calibration and maintenance records).*	☐ YES	☐ NO	☐ N/A
(c) LAB EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS KEPT.	☐ YES	☐ NO	☐ N/A
(d) FACILITY OPERATING RECORDS KEPT INCLUDING OPERATING LOGS FOR EACH TREATMENT UNIT.	☐ YES	☐ NO	☐ N/A
(e) QUALITY ASSURANCE RECORDS KEPT.	☐ YES	☐ NO	☐ N/A
(f) RECORDS MAINTAINED OF MAJOR CONTRIBUTING INDUSTRIES *(and their compliance status)* USING PUBLICLY OWNED TREATMENT WORKS.	☐ YES	☐ NO	☐ N/A

SECTION H - Permit Verification

INSPECTION OBSERVATIONS VERIFY THE PERMIT. ☐ YES ☐ NO ☐ N/A *(Further explanation attached ____)*
DETAILS:

(a) CORRECT NAME AND MAILING ADDRESS OF PERMITTEE.	☐ YES	☐ NO	☐ N/A
(b) FACILITY IS AS DESCRIBED IN PERMIT.	☐ YES	☐ NO	☐ N/A
(c) PRINCIPAL PRODUCT(S) AND PRODUCTION RATES CONFORM WITH THOSE SET FORTH IN PERMIT APPLICATION.	☐ YES	☐ NO	☐ N/A
(d) TREATMENT PROCESSES ARE AS DESCRIBED IN PERMIT APPLICATION.	☐ YES	☐ NO	☐ N/A
(e) NOTIFICATION GIVEN TO EPA/STATE OF NEW, DIFFERENT OR INCREASED DISCHARGES.	☐ YES	☐ NO	☐ N/A
(f) ACCURATE RECORDS OF RAW WATER VOLUME MAINTAINED.	☐ YES	☐ NO	☐ N/A
(g) NUMBER AND LOCATION OF DISCHARGE POINTS ARE AS DESCRIBED IN PERMIT.	☐ YES	☐ NO	☐ N/A
(h) CORRECT NAME AND LOCATION OF RECEIVING WATERS.	☐ YES	☐ NO	☐ N/A
(i) ALL DISCHARGES ARE PERMITTED.	☐ YES	☐ NO	☐ N/A

SECTION I - Operation and Maintenance

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. ☐ YES ☐ NO ☐ N/A *(Further explanation attached ____)*
DETAILS:

(a) STANDBY POWER OR OTHER EQUIVALENT PROVISIONS PROVIDED.	☐ YES	☐ NO	☐ N/A
(b) ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	☐ YES	☐ NO	☐ N/A
(c) REPORTS ON ALTERNATE SOURCE OF POWER SENT TO EPA/STATE AS REQUIRED BY PERMIT.	☐ YES	☐ NO	☐ N/A
(d) SLUDGES AND SOLIDS ADEQUATELY DISPOSED.	☐ YES	☐ NO	☐ N/A
ALL TREATMENT UNITS IN SERVICE.	☐ YES	☐ NO	☐ N/A
CONSULTING ENGINEER RETAINED OR AVAILABLE FOR CONSULTATION ON OPERATION AND MAINTENANCE PROBLEMS.	☐ YES	☐ NO	☐ N/A
(g) QUALIFIED OPERATING STAFF PROVIDED.	☐ YES	☐ NO	☐ N/A
(h) ESTABLISHED PROCEDURES AVAILABLE FOR TRAINING NEW OPERATORS.	☐ YES	☐ NO	☐ N/A
(i) FILES MAINTAINED ON SPARE PARTS INVENTORY, MAJOR EQUIPMENT SPECIFICATIONS, AND PARTS AND EQUIPMENT SUPPLIERS.	☐ YES	☐ NO	☐ N/A
(j) INSTRUCTIONS FILES KEPT FOR OPERATION AND MAINTENANCE OF EACH ITEM OF MAJOR EQUIPMENT.	☐ YES	☐ NO	☐ N/A
(k) OPERATION AND MAINTENANCE MANUAL MAINTAINED.	☐ YES	☐ NO	☐ N/A
(l) SPCC PLAN AVAILABLE.	☐ YES	☐ NO	☐ N/A
(m) REGULATORY AGENCY NOTIFIED OF BY PASSING. *(Dates ____ ____)*	☐ YES	☐ NO	☐ N/A
(n) ANY BY-PASSING SINCE LAST INSPECTION.	☐ YES	☐ NO	☐ N/A
(o) ANY HYDRAULIC AND/OR ORGANIC OVERLOADS EXPERIENCED.	☐ YES	☐ NO	☐ N/A

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SECTION J - Compliance Schedules

PERMITTEE IS MEETING COMPLIANCE SCHEDULE. ☐ YES ☐ NO ☐ N/A *(Further explanation attached _____)*

CHECK APPROPRIATE PHASE(S):

- ☐ (a) THE PERMITTEE HAS OBTAINED THE NECESSARY APPROVALS FROM THE APPROPRIATE AUTHORITIES TO BEGIN CONSTRUCTION.
- ☐ (b) PROPER ARRANGEMENT HAS BEEN MADE FOR FINANCING *(mortgage commitments, grants, etc.)*.
- ☐ (c) CONTRACTS FOR ENGINEERING SERVICES HAVE BEEN EXECUTED.
- ☐ (d) DESIGN PLANS AND SPECIFICATIONS HAVE BEEN COMPLETED.
- ☐ (e) CONSTRUCTION HAS COMMENCED.
- ☐ (f) CONSTRUCTION AND/OR EQUIPMENT ACQUISITION IS ON SCHEDULE.
- ☐ (g) CONSTRUCTION HAS BEEN COMPLETED.
- ☐ (h) START-UP HAS COMMENCED.
- ☐ (i) THE PERMITTEE HAS REQUESTED AN EXTENSION OF TIME.

SECTION K - Self-Monitoring Program

Part 1 – Flow measurement *(Further explanation attached _____)*

PERMITTEE FLOW MEASUREMENT MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT. DETAILS:	☐ YES	☐ NO	☐ N/A
(a) PRIMARY MEASURING DEVICE PROPERLY INSTALLED.	☐ YES	☐ NO	☐ N/A
TYPE OF DEVICE: ☐ WEIR ☐ PARSHALL FLUME ☐ MAGMETER ☐ VENTURI METER ☐ OTHER *(Specify _____)*			
(b) CALIBRATION FREQUENCY ADEQUATE. *(Date of last calibration _____)*	☐ YES	☐ NO	☐ N/A
(c) PRIMARY FLOW MEASURING DEVICE PROPERLY OPERATED AND MAINTAINED.	☐ YES	☐ NO	☐ N/A
(d) SECONDARY INSTRUMENTS *(totalizers, recorders, etc.)* PROPERLY OPERATED AND MAINTAINED.	☐ YES	☐ NO	☐ N/A
(e) FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGES OF FLOW RATES.	☐ YES	☐ NO	☐ N/A

Part 2 – Sampling *(Further explanation attached _____)*

PERMITTEE SAMPLING MEETS THE REQUIREMENTS AND INTENT OF THE PERMIT. DETAILS:	☐ YES	☐ NO	☐ N/A
(a) LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	☐ YES	☐ NO	☐ N/A
(b) PARAMETERS AND SAMPLING FREQUENCY AGREE WITH PERMIT.	☐ YES	☐ NO	☐ N/A
(c) PERMITTEE IS USING METHOD OF SAMPLE COLLECTION REQUIRED BY PERMIT. IF NO, ☐ GRAB ☐ MANUAL COMPOSITE ☐ AUTOMATIC COMPOSITE FREQUENCY _____	☐ YES	☐ NO	☐ N/A
(d) SAMPLE COLLECTION PROCEDURES ARE ADEQUATE.	☐ YES	☐ NO	☐ N/A
(i) SAMPLES REFRIGERATED DURING COMPOSITING	☐ YES	☐ NO	☐ N/A
(ii) PROPER PRESERVATION TECHNIQUES USED	☐ YES	☐ NO	☐ N/A
(iii) FLOW PROPORTIONED SAMPLES OBTAINED WHERE REQUIRED BY PERMIT	☐ YES	☐ NO	☐ N/A
(iv) SAMPLE HOLDING TIMES PRIOR TO ANALYSES IN CONFORMANCE WITH 40 CFR 136.3	☐ YES	☐ NO	☐ N/A
(e) MONITORING AND ANALYSES BEING PERFORMED MORE FREQUENTLY THAN REQUIRED BY PERMIT.	☐ YES	☐ NO	☐ N/A
(f) IF (e) IS YES, RESULTS ARE REPORTED IN PERMITTEE'S SELF-MONITORING REPORT.	☐ YES	☐ NO	☐ N/A

Part 3 – Laboratory *(Further explanation attached _____)*

PERMITTEE LABORATORY PROCEDURES MEET THE REQUIREMENTS AND INTENT OF THE PERMIT. DETAILS:	☐ YES	☐ NO	☐ N/A
(a) EPA APPROVED ANALYTICAL TESTING PROCEDURES USED. *(40 CFR 136.3)*	☐ YES	☐ NO	☐ N/A
(b) IF ALTERNATE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED.	☐ YES	☐ NO	☐ N/A
(c) PARAMETERS OTHER THAN THOSE REQUIRED BY THE PERMIT ARE ANALYZED.	☐ YES	☐ NO	☐ N/A
(d) SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT.	☐ YES	☐ NO	☐ N/A
(e) QUALITY CONTROL PROCEDURES USED.	☐ YES	☐ NO	☐ N/A
(f) DUPLICATE SAMPLES ARE ANALYZED. _____ % OF TIME.	☐ YES	☐ NO	☐ N/A
(g) SPIKED SAMPLES ARE USED. _____ % OF TIME.	☐ YES	☐ NO	☐ N/A
(h) COMMERCIAL LABORATORY USED.	☐ YES	☐ NO	☐ N/A
(i) COMMERCIAL LABORATORY STATE CERTIFIED.	☐ YES	☐ NO	☐ N/A

LAB NAME _____

LAB ADDRESS _____

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SECTION L - Effluent/Receiving Water Observations *(Further explanation attached _____)*

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	VISIBLE FLOAT SOL	COLOR	OTHER

(Sections M and N: Complete as appropriate for sampling inspections)

SECTION M - Sampling Inspection Procedures and Observations *(Further explanation attached _____)*

- ☐ GRAB SAMPLES OBTAINED
- ☐ COMPOSITE OBTAINED
- ☐ FLOW PROPORTIONED SAMPLE
- ☐ AUTOMATIC SAMPLER USED
- ☐ SAMPLE SPLIT WITH PERMITTEE
- ☐ CHAIN OF CUSTODY EMPLOYED
- ☐ SAMPLE OBTAINED FROM FACILITY SAMPLING DEVICE

COMPOSITING FREQUENCY _____ PRESERVATION _____

SAMPLE REFRIGERATED DURING COMPOSITING: ☐ YES ☐ NO

SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE _____

SECTION N - Analytical Results *(Attach report if necessary)*

APPENDIX F - DEFICIENCY NOTICE

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

MEMORANDUM

OFFICE OF ENFORCEMENT

SUBJECT: "Deficiency Notice" Implementation to Improve Quality Assurance in NPDES Permittee Self-Monitoring Activities

FROM: Director, Enforcement Division (EN-338)

TO: Enforcement Division Directors, Regions I - X
Surveillance and Analysis Division Directors, Regions I - X
Director, National Enforcement Investigations Center, Denver

The Enforcement Divisions and the Surveillance and Analysis Divisions in several Regions have developed a form, called a Deficiency Notice, which their inspectors issue at the end of compliance inspections. This Deficiency Notice alerts NPDES permittees to problems in their routine self-monitoring activities. On June 11, 1979, the Office of Water Enforcement proposed that all the Regional offices adopt this form along with the Guidance for its use, and asked for your comments on this proposal. The Deficiency Notice and Guidance, which are attached, reflect your comments.

We have ordered the Deficiency Notice Forms, which will be printed on no-carbon-required paper and will be color coded in pads to correlate with the NPDES Compliance Inspection Form (EPA 3560-3). You may reproduce the attached form for use until you receive these forms.

The Deficiency Notice was designed so that State NPDES programs might easily use it. However, EPA cannot now sanction its use by the States since the Office of Management and Budget (OMB) has not authorized the form for non-Federal use. We will attempt to get OMB approval.

Since the Deficiency Notice provides a swift and simple mechanism for responding to deficiencies in self-monitoring data, I believe that its use will substantially improve the performance of wastewater treatment facilities without creating additional resource burdens or enforcement problems. If you have any questions about the Deficiency Notice or its use, please do not hesitate to call Gary Polvi of my staff at 755-0994.

J. Brian Molloy

Attachments

DEFICIENCY NOTICE GUIDANCE

Purpose

The purpose for using the Deficiency Notice is to provide a swift and simple method for improving the quality of data from NPDES self-monitoring activities. Since an inspector may issue a Deficiency Notice during any NPDES compliance inspection to alert the permittee to either existing or potential problems in self-monitoring, its receipt prompts the permittee to quickly take corrective action, as close as possible to the time the inspector perceives the problem.

Scope

The Deficiency Notice is a tool for use in conjunction with any type of EPA NPDES compliance inspection (i.e., compliance evaluation, sampling, performance audit, biomonitoring, etc.), during which the inspector identifies problems with self-monitoring that warrant response.

The Deficiency Notice and Guidance were designed so that State NPDES compliance monitoring programs could also easily use them. (Note the use of the term "regulatory authority" throughout this guidance.) However, EPA cannot yet sanction the States' use of this form because the Office of Management and Budget (OMB) has not yet approved the form for non-Federal use.

Use of the Deficiency Notice does not apply to a wide range of possible permit violations. It is to be used by the inspector to alert permittees to deficiencies in their self-monitoring activities only. The enforcement office of the regulatory authority (i.e., the EPA Regional Enforcement Division or its State counterpart), not the inspector, will continue to handle violations relative to compliance schedules or effluent limitations.

Form Description

The Deficiency Notice (see attachment) is one page long and is for use in conjunction with the standard EPA Compliance Inspection Form (EPA 3560-3, September, 1977). The reverse side of the Notice contains general instructions to inspectors for completing the form. The regulatory authority using the form may add other specific instructions that do not conflict with this guidance.

The form has four sections: (1) basic facility data, (2) deficiencies, (3) comments, and (4) inspector identification. These sections contain individual spaces where the inspector during an

inspection can log deficiencies in the following self-monitoring activities: (1) monitoring location, (2) flow measurement, (3) sample collection/holding time, (4) sample preservation, (5) test procedures, (6) record keeping, (7) other self-monitoring deficiencies (i.e. sampling frequency, instrument calibration, etc.). Since the existing Compliance Inspection Form (which inspectors now complete) includes questions and answers relating to the above seven activities, inspectors should not need much additional time to complete this Deficiency Notice.

Administrative Procedures

With few exceptions (see March 7, 1977 EMS Guide), the handling and tracking of Deficiency Notices will follow the normal EPA Enforcement Management System (EMS) procedures. Inspectors can issue the Deficiency Notice to a permittee immediately following a compliance inspection if they discover any permit deficiencies which the Notice includes. Under unusual circumstances inspectors may delay issuing a Deficiency Notice until after conferring with other officials of the regulatory authority.

EMS requires the offices responsible for inspections and for NPDES enforcement to jointly establish a policy delineating the procedure for the permittee to appropriately respond to the Deficiency Notice. In the EPA Regions, the Directors of the Enforcement Division and the Surveillance and Analysis (S&A) Division will develop this policy. If the offices agree to allow the permittee to submit a separate written response rather than to include the response as part of a regular Discharge Monitoring Report (DMR) submission, they will require the inspector to record the necessary mailing instructions and deadline for response under the additional comment section of the Deficiency Notice. The inspector indicates the appropriate method for the permittee's response in the "requested action" section of the Deficiency Notice. Due to the nature of most self-monitoring problems it is reasonable for the regulatory authority to ask that the permittee submit a written description of any corrective actions within 15 work days after receiving the Notice. Where the permittee is asked to respond as part of a regular DMR submission, a similar reporting time allowance should be allotted. In either response option, the inspector should always indicate in the Deficiency Notice the requested date for permittee response.

Having the permittee document Deficiency Notice corrective actions as part of a regular DMR submission establishes accountability for the compliance inspection in the official NPDES permit compliance file even before a compliance review is undertaken. This is a resource efficient method of documenting the minimum benefit from performing inspections.

The issuance of a Deficiency Notice is not a formal enforcement action. It is not intended and must not be construed as an administrative or legal order to the permittee. Therefore, the action by the permittee to respond is voluntary, but incentive for such response comes from the positive consideration it may have on further formal enforcement follow-up of the inspection.

When the regulatory authority receives the permittee's response to the Deficiency Notice, they will review the inspection data and the permittee's response according to EMS procedures. If during routine reviews of inspection data, the authorities note deficiencies in self-monitoring data and note that the inspector did not issue a Deficiency Notice, they may issue one at any time.

The responsibility for all enforcement activity shall always remain in the enforcement/compliance review office of the regulatory authority. After agreement between the Directors of the Regional Enforcement Division and the S&A Divison, these offices should incorporate details for insuring which office retains which responsibility into the Regional EMS. Whether or not a Deficiency Notice has been issued, the enforcement office of the regulatory authority can take administrative or legal action at any time. Also, a Deficiency Notice may not be appropriate in those cases where additicnal enforcement action is expected or litigation against the permittee is already underway.

DEFICIENCY NOTICE

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM *(NPDES)*

(Read instructions on back of last part before completing)

PERMITTEE *(Facility)* NAME AND ADDRESS

PERMITTEE REPRESENTATIVE *(Receiving this Notice)*/ TITLE

NPDES PERMIT NO.

During the compliance inspection carried out on *(date)* _____ the deficiencies noted below were found. Additional areas of deficiency may be brought to your attention following a complete review of the Inspection Report and other information on file with the REGULATORY AUTHORITY administering your NPDES PERMIT.

D E F I C I E N C I E S

MONITORING LOCATION *(Describe)*

FLOW MEASUREMENT *(Describe)*

SAMPLE COLLECTION/HOLDING TIME *(Describe)*

SAMPLE PRESERVATION *(Describe)*

TEST PROCEDURES, SECTION 304(h), 40 CFR 136 *(Describe)*

RECORD KEEPING *(Describe)*

OTHER SELF-MONITORING DEFICIENCIES *(Describe)*

ADDITIONAL COMMENTS

REQUESTED ACTION—Your attention to the correction of the deficiencies noted above is requested. Receipt of a description of the corrective actions taken will be considered in the determination of the need for further Administrative or Legal Action. Your response is to be (Inspector line out inappropriate response method): *(1) included with your next NPDES Discharge Monitoring Report (DMR) or (2) submitted as directed by the inspector.* Questions regarding possible follow-up action can be answered by the REGULATORY AUTHORITY to which your DMRs are submitted and which administers your NPDES Permit.

INSPECTOR'S SIGNATURE	INSPECTOR'S ADDRESS/PHONE NO.	REGULATORY AUTHORITY/ADDRESS	DATE
INSPECTOR'S PRINTED NAME			

EPA Form 3560-4 (2-80)